

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:	)	Chapter 11
	)	
WELLPATH HOLDINGS, INC., et al.,	)	
	)	Case No. 24-90533 (ARP)
Debtor.	)	
	)	

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**WITNESS AND EXHIBIT LIST**

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Judge:	Hon. Alfredo R. Pérez
Courtroom Deputy:	Akeita House
Hearing Date:	January 14, 2025
Hearing Time:	9:30 a.m. prevailing Central Time
Party's Name:	Plaintiffs reflected in ECF 245-1 (the " <u>Claimants</u> ")
Attorney's Name:	R. J. Shannon
Attorney's Phone:	(713) 714-5770
Nature of Proceeding:	<p>Hearing on:</p> <ol style="list-style-type: none"> <li>1. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Honor and Incur Obligations to Professional Corporations and (B) Obtain New Professional Corporation Contracts, (II) Extending Statutory Protections to Professional Corporations, and (III) Granting Related Relief [ECF No. 15]</li>   <li>2. Debtors' Emergency Motion for Entry of Interim and Final Orders to Enforce the Automatic Stay or in the Alternative Extend the Automatic Stay to Non-Debtor Defendants [ECF No. 17]</li> </ol>
Witnesses:	<ol style="list-style-type: none"> <li>1. Any witness called or designated by any other party; and</li>   <li>2. Any witness necessary to rebut the testimony of any witness called or designated by any other party.</li> </ol>

**EXHIBITS**

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
1	List of Claimants' Lawsuits [ECF No. 245-1] (Summary of Exs. 7 through 39)				
2	Plaintiffs' Amended Unopposed Motion for Preliminary Approval of Settlement of Class Action Litigation [Dkt. No. 499] from Alameda County Male Prisoners, et al. v. Alameda County Sheriff's Office, et al., Case No. 3:19-cv-07423-JSC (N.D. Cal.) [ECF No. 245-2].				
3	Suggestion of Bankruptcy and Notice of Stay [Dkt. No. 504] from Alameda County Male Prisoners, et al. v. Alameda County Sheriff's Office, et al., Case No. 3:19-cv-07423-JSC (N.D. Cal.) [ECF No. 245-3]				
4	Notice of Settlement [Dkt. No. 177] in Vargas v. United States of America et al., Case No. 5:23-cv-00380 (C.D. Cal.)				
5	November 18, 2024, Order in Capaci v. CO Dasraj, et al., Case No. 7:24-cv-4626 (PMH) (S.D.N.Y.) [ECF No. 245-5]				
6	November 18, 2024, Order in Capaci v. CO Dasraj, et al., Case No. 7:24-cv-4626 (PMH) (S.D.N.Y.) [ECF No. 245-6]				
7	Complaint in A.G. v. Tulare County, et al., 1:23-cv-00500-JLT-SKO (E.D. Cal.).				
8	Complaint in Alameda County Male Prisoners, et al. v. Alameda County Sheriff's Office, et al., Case No. 3:19-cv-07423-JSC (N.D. Cal.).				
9	Complaint in Balliet v. Luzerne County et al., Case No. 3:22-cv-02032 (M.D. Penn.).				

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted /Not Admitted</b>	<b>Disposition</b>
10	Complaint in Beckner v. County of Santa Cruz, et al., Case No. 5:23-cv-05032-BLF (N.D. Cal.).				
11	Complaint in Brazelton v. Wellpath et al., Case No. 1:22-cv-01324 (C.D. Illi.).				
12	Complaint in Bush et al. v. Luzerne County et al., Case No. 23-cv-01152 (M.D. Penn.).				
13	Complaint in Capaci v. CO Dasraj, et al., Case No. 7:24-cv-4626 (PMH) (S.D.N.Y.).				
14	Complaint in C.R.A et al. v. Fresno County et al., Case No. 2:23-00672 (E.D. Cal.).				
15	Complaint in Curtis v. Lackawana County et al., Case No. 3:23-cv-02092-JFS (M.D. Penn.).				
16	Complaint in Desir v. Sheriff Gregory Tony et al., Case No. 0:23-cv-60499 (S.D. Fla.).				
17	Complaint in Esparza v. Wellpath, LLC et al., 23-cv-02161-JCM-VCF (D. Nev.).				
18	Complaint in Fahrni et al. v. Tulare County, et al., 1:23-cv-01265-KES-SAB (E.D. Cal.).				
19	Complaint in Hirsch v. Will County, et al., Case No. 19-CV-7398 (N.D. Ill.).				
20	Complaint in Johnston et al. v. County of Ventura, et al., 2:23-cv-05902 (C.D. Cal.).				
21	Complaint in J.S. et al. v. County of Fresno et al., Case No. :23-cv-01070 (N.D. Cal.).				
22	Complaint in K.C. et al. v. Alameda County, et al., 4:22-cv-01817-DMR (N.D. Cal.).				

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted /Not Admitted</b>	<b>Disposition</b>
23	Complaint in Laurel v. County of Alameda, et al., Case No. 3:24-cv-04427 (N.D. Cal.).				
24	Complaint in Magana v. County of Alameda et al., 24-cv-04716-JD (N.D. Cal.).				
25	Complaint in McCullough v. Clinton County et al., Case No. 4:23-cv-00171 (M.D. Penn.).				
26	Complaint in Mohrbacher, et al. v. Alameda County Sheriff's Office, et al., 3:18-cv-00050-JD (N.D. Cal.).				
27	Complaint in Moone v. Board of County Commissioners of the County of San Juan et al., Case No. 1:21-cv-01130 (D. N.M.).				
28	Complaint in O'Neil v. Las Vegas Metropolitan Police Department et al., Case No. 2:22-cv-00474-ART-NJK (D. Nev.)				
29	Complaint in Ontiveros v. Bd. of Cnty. Comm'r's of San Juan, et al., Case No. D-1116-CV-2023-01315 (11th Judicial District Court for N.M.).				
30	Complaint in Polachek v Luzerne County et al., Case No. 23-cv-01545 (M.D. Penn.).				
31	Complaint in Pugh v. Wellpath, et al., 3:23-cv-03677-CRB (N.D. Cal.).				
32	Complaint in Reynolds et al. v. County of Madera et al., Case No. 1:23-cv-00538 (E.D. Cal.).				
33	Complaint in Roberts et al. v. Wellpath et al., Case No. 3:23-cv-03662 (N.D. Cal.).				

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted /Not Admitted</b>	<b>Disposition</b>
34	Complaint in Rodriguez-Gonzalez et al. v. County of Santa Barbara et al., 2:24-cv-04685-ODW-E (C.D. Cal.).				
35	Complaint in Smith et al. v. County of Santa Cruz, et al., Case No. 5:21-cv-00421 (N.D. Cal.).				
36	Complaint in Smith et al. v. Bains et al., Case No. 24-cv-02102-TWT (N.D. Ga.).				
37	Complaint in Smith v. Las Vegas Metropolitan Police Department et al., Case No. 23-cv-00092 (D. Nev.).				
38	Complaint in Vargas v. United States of America et al., Case No. 5:23-cv-00380 (C.D. Cal.).				
39	Complaint in Yang et al. v. County of Yuba et al., 2:23-cv-00066-TLN-JDP (E.D. Cal.).				
40	Order in Desir v. Sheriff Gregory Tony et al, Case No. 0:23-cv-60499 (S.D. Fla.).				
41	Debtors' Emergency Motion for Entry of Interim and Final Orders to Enforce the Automatic Stay or in the Alternative Extend the Automatic Stay to Non-Debtor Defendants [ECF No. 17]				

The Claimants reserve the right to supplement, amend, or delete any witness and exhibits prior to the hearing. The Claimants also reserve the right to (a) ask the Court to take judicial notice of any document, (b) introduce exhibits previously admitted or attached as exhibits to the relevant pleadings, (c) introduce any exhibit necessary or appropriate to necessary to rebut the testimony of any witnesses called or designated by any other party or an exhibit introduced or designated by any other party, and (e) seek to introduce any exhibit designated by any other party.

Dated: January 10, 2025

Respectfully submitted,

SHANNON & LEE LLP

/s/R. J. Shannon

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*Bankruptcy Co-Counsel to the Claimants for the  
Limited Purpose of Responding to the Stay Motion*